

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WILLIAM RICHARD HAMILTON,

Plaintiff,

vs.

EARLY WARNING SERVICES, LLC.;  
SANTANDER BANK, N.A.,

Defendants.

) Case No: 1:20-cv-04431-CM  
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DATE FILED: 07/01/2020

**MEMO ENDORSED**

**MOTION FOR LEAVE TO SEAL EXHIBIT 1 TO PLAINTIFF'S COMPLAINT**

Plaintiff William R. Hamilton, through undersigned counsel, hereby moves this Court for an Order sealing Exhibit 1 in order to protect Plaintiff's personal information.

Plaintiff initially filed his Complaint *pro se*, without knowledge of how to seal documents or whether documents should be sealed. Plaintiff attached Exhibit 1 to his Complaint to demonstrate the errors on his credit report made by the Defendants. Plaintiff's Exhibit 1 is an unredacted copy of his complete credit file with Early Warning. The credit file contains Plaintiff's personal information including his date of birth, social security number, account numbers and financial information. Plaintiff moves the Court to seal this document in order to protect Plaintiff's privacy interests, and avoid the possibility of additional instances of identity theft.

Dated: June 22, 2020

Respectfully Submitted,

/S/ Daniel Zemel, Esq.

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Application GRANTED. The Clerk of Court is respectfully directed to restrict the viewing level for docket entry 2 to the parties only.

SO ORDERED.

Date: 07/01/2020



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE